

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Danielle Christa Schaeffer aka Danielle C.
Schaeffer, aka Danielle Schaeffer
Mark D. Schaeffer aka Mark Douglas Schaeffer,
aka Mark Schaeffer

Debtor(s)

Nationstar Mortgage LLC

Movant

vs.

Danielle Christa Schaeffer aka Danielle C. Schaeffer,
aka Danielle Schaeffer
Mark D. Schaeffer aka Mark Douglas Schaeffer, aka
Mark Schaeffer

Debtor(s)

Patricia A. Yeakel

Co-Debtor

Scott F. Waterman

Trustee

CHAPTER 13

NO. 18-10620 PMM

11 U.S.C. Section 362 and 1301

**MOTION OF Nationstar Mortgage
FOR RELIEF FROM THE AUTOMATIC STAY
UNDER SECTION 362 and 1301**

1. Movant is Nationstar Mortgage LLC.
2. Debtors and Patricia A. Yeakel, co-debtor are the owner(s) of the premises 521 Frutcheys Hill Road, Easton, PA 18040, hereinafter referred to as the mortgaged premises.
3. Movant is the holder of a mortgage, original principal amount of \$274,400.00 on the mortgaged premises that was executed on June 8, 2011. The mortgage has been assigned as follows:

Mortgage Electronic Registration Systems, Inc., Its Successors and Assigns to Nationstar Mortgage LLC D/B/A Mr. Cooper recorded on February 20, 2018 at Instrument Number 2018004117

Attached are redacted copies of any documents that support the claim, such as promissory notes, purchase order, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements in support of right to seek a lift of the automatic stay and foreclose if necessary.
4. Scott F. Waterman, is the Trustee appointed by the Court.
5. The commencement and/or continuation of the mortgage foreclosure proceedings by reason of non-payment of monthly mortgage payments were stayed by the filing of a Chapter 13 Petition in Bankruptcy by the Debtor(s).

6. Debtor and Patricia A. Yeakel, co-debtor have failed to make the monthly post-petition mortgage payments in the amount of \$2,650.06 for the months of May 2022 through August 2022 plus late charges if applicable. The debtor's suspense balance is \$2,065.62.

7. The total amount necessary to reinstate the loan post-petition is \$8,534.62.

8. Movant is entitled to relief from stay for cause.

9. This motion and the averments contained therein do not constitute a waiver by Movant of its right to seek reimbursement of any amounts not included in this motion, including fees and costs, due under the terms of the mortgage and applicable law.

WHEREFORE, Movant prays that an Order be entered modifying the Stay and permitting Movant to proceed with its mortgage foreclosure on the mortgaged premises, and to allow the Sheriff's Grantee to take any legal action to enforce its right to possession of the mortgage premises. Further, Movant prays that an Order be entered awarding Movant the costs of this suit, reasonable attorney's fees in accordance with the mortgage document and current law together with interest.

/s/ Brian C. Nicholas, Esq.

Brian C. Nicholas, Esquire
KML Law Group, P.C.
701 Market Street, Suite 5000
Philadelphia, PA 19106-1532
Phone: (215) 627-1322 Fax: (215) 627-7734
Attorneys for Movant/Applicant